

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALGONQUIN GAS TRANSMISSION, LLC,

Plaintiff,

v.

APPROXIMATELY 170,197 CUBIC FEET and
APPROXIMATELY 8,248 LINEAR FEET OF
PERMANENT EASEMENT AREA, and
APPROXIMATELY 652,489 SQUARE FEET OF
TEMPORARY EASEMENT AREA IN THE CITY
OF BOSTON, MASSACHUSETTS, THE BOSTON
PUBLIC IMPROVEMENT COMMISSION, and
THE CITY OF BOSTON, MASSACHUSETTS

Defendants.

No. 15-cv-12870-WGY

AFFIDAVIT OF RICHARD NATALE, JR.

I, Richard Natale, Jr., depose and state that I have personal knowledge of the following:

1. I am the son of Michelle Natale, who is the assistant to Thomas S. Fitzpatrick at Davis, Malm & D'Agostine, P.C.
2. On August 29, 2015, I took four (4) GoPro videos while driving down three streets in West Roxbury, Massachusetts. I posted the videos to YouTube.com. The links to these videos are <https://youtu.be/Pafmg-NQkOU>; <https://youtu.be/kVVL RB PpgTQ>; <https://youtu.be/KmA01eo-QFw>; and <https://youtu.be/5xNMrAo1cOo>, and they can be accessed by anyone with internet access.

3. I made the videos while riding a motorcycle. The GoPro camera was attached to my helmet. In each of the videos, I followed the route shown on the three pages attached hereto as Exhibit 1.

4. In two (2) of the videos, I started at the Dedham/West Roxbury Line on Washington Street, I then proceed to Grove Street, taking a left on to Grove, proceeding on to Centre Street, taking a right on to Centre, and ending at the intersection with St. Theresa Avenue and Lorette Street. In the other two (2) videos, I started on Centre Street near St. Theresa Avenue and then proceed to Grove Street taking a left on to Grove, proceeding on to Washington Street, taking a right on to Washington, and ending at the Dedham/West Roxbury Line.

I state under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 31, 2015.

/s/ Richard Natale, Jr.

Richard Natale, Jr.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on September 1, 2015 and served by mail on anyone unable to accept electronic filing.

/s/ Thomas S. Fitzpatrick

Thomas S. Fitzpatrick

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